

FILED

**UNITED STATES DISTRICT COURT****Edward R. Roybal Federal Building and United States Courthouse**

255 East Temple Street Los Angeles, CA 90012-3332

2025 SEP 11 PM 12:34

U.S. DISTRICT COURT  
CENTRAL DISTRICT  
LOS ANGELESBY: ESA

JOB Family TRUST

Plaintiff,

v.

Good Neighbor Homes, LLC, Olivia Reyes, Mortgage Connect LP, Trustee Corp, MTC  
Financial DBA Trustee Corp, Finance of America Reverse, LLC

Defendants.

CV25-5445-JFW

Case No. 2:25-cv-05445-JFW-PD

**Violation 28 USC 1331 (a) RP Federal Question : Real Property****PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT, SANCTIONS, AND  
COMPELLING PRODUCTION**

NOW COMES the Plaintiff, by and through undersigned counsel, and respectfully moves this Court, pursuant to Fed. R. Civ. P. 55, 37(b), and the Court's inherent authority, for entry of default judgment, sanctions, and an order compelling production of subpoenaed documents.

In support thereof, Plaintiff states as follows:

1. **Procedural Posture:** Plaintiff properly filed this action on June 14, 2025 and served Defendants on June 14, 2025, as evidenced by proofs of service on file.
2. **Failure to Respond:** Pursuant to Fed. R. Civ. P. 12(a), Defendants were required to file an answer or responsive pleading within [21 days or extended time if waived]. To date, no Defendant has responded, moved, or otherwise appeared. September 8, 2025
3. **Discovery Violations:** Plaintiff properly served subpoenas and discovery requests seeking critical documents regarding ownership of the note, transfers of payment, and chain of

title. Defendants have willfully failed to comply with these requests and remain in violation of Rule 37 and the Court's discovery obligations.

4. Prejudice: Plaintiff cannot fairly prosecute this action without access to the requested documents, which go to the heart of standing, ownership, and authority to enforce the alleged mortgage obligation. Defendants' stonewalling constitutes bad faith litigation tactics and deliberate obstruction.

## **RELIEF REQUESTED**

WHEREFORE, Plaintiff respectfully requests this Court:

- a. Enter default judgment against all Defendants pursuant to Fed. R. Civ. P. 55(b), or in the alternative, enter Clerk's Entry of Default and schedule hearing on damages;
- b. Compel production of all requested and subpoenaed documents within 10 days;
- c. Sanction Defendants under Fed. R. Civ. P. 37(b)(2), including striking defenses, awarding attorneys' fees and costs, and imposing monetary penalties for noncompliance;
- d. Grant such other relief as this Court deems just and proper.

Respectfully submitted,

  
JOB Family Trust